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7 META PLATFORMS, INC. and INSTAGRAM, LLC

8  
9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA

11 RICHARD JACKSON, et al.,  
12 Plaintiffs,  
13 v.  
14 TWITTER, INC., et al.  
15 Defendants.

Case No. 2:22-CV-09438-AB (MAA)  
**JOINT STIPULATION TO  
EXTEND TIME TO RESPOND TO  
INITIAL COMPLAINT**

**[Filed Concurrently with the  
Declaration of Paven Malhotra and  
[Proposed] Order]**

Judge: Hon. Andre Birotte, Jr.

Complaint Filed: December 29, 2022

**JOINT STIPULATION**

Plaintiffs Richard Jackson, Julie Briggs, and Gregg Buchwalter (collectively “Plaintiffs”) and Defendants Meta Platforms, Inc., Instagram, LLC<sup>1</sup> (collectively “Meta”) Google LLC, Alphabet, Inc., YouTube LLC (collectively, “Google”),<sup>2</sup> Twitter, Inc., Amazon.com, Inc.,<sup>3</sup> and the DNC Services Corporation (the “Moving Defendants”) (together with Plaintiffs, the “Parties”) through their respective counsel of record, hereby agree and stipulate as follows:

WHEREAS, Plaintiffs filed their initial Complaint on December 29, 2022;

WHEREAS, Plaintiffs served the summons and Complaint on Meta on February 28, 2023; on Twitter, Inc., on January 20, 2023; on Google on February 28, 2023; on Amazon.com, Inc., on February 28, 2023, and on the DNC Service Corporation on March 1, 2023;

WHEREAS, Meta’s current response to the Complaint is due on or before, March 21, 2023; Twitter, Inc.’s response deadline is April 11, 2023; Google’s response deadline is March 21, 2023; Amazon.com, Inc.’s response deadline is March 21, 2023; and the DNC Service Corporation’s response deadline is March 22, 2023;

WHEREAS, the Parties have conferred and agree that, to afford the Moving Defendants adequate time to respond to the Complaint, their deadline to respond to the Complaint should be extended up to and including April 21, 2023;

WHEREAS, Plaintiffs recently stipulated to provide Defendants American Federation of Teachers and the National Education Association until April 21, 2023 to file their responsive pleading;

NOW THEREFORE, it is hereby stipulated and agreed that:

The Moving Defendants’ deadline to respond to the Complaint shall extend

<sup>1</sup> Instagram LLC is incorrectly identified in the Complaint as Instagram, Inc.

<sup>2</sup> YouTube LLC is incorrectly identified in the Complaint as Youtube, Inc.

<sup>3</sup> Amazon.com, Inc. is incorrectly identified in the Complaint as Amazon, Inc.

up to and including April 21, 2023.

**IT IS SO STIPULATED.**

Respectfully submitted,

Dated: March 21, 2023

KEKER, VAN NEST & PETERS  
LLP

By /s/Paven Malhotra

PAVEN MALHOTRA  
MATAN SHACHAM  
JANAY M. WILLIAMS

Attorneys for Defendants,  
GOOGLE LLC, ALPHABET, INC.,  
AND YOUTUBE LLC

Dated: March 21, 2023

MCGUIREWOODS LLP

By /s/ Tanya Greene

TANYA L. GREENE  
JONATHAN Y. ELLIS

Attorneys for Defendant TWITTER,  
INC.

Dated: March 21, 2023

WILSON SONSINI GOODRICH &  
ROSATI, P.C.

By /s/ Brian Willen

BRIAN M. WILLEN (*pro hac vice*  
*forthcoming*)  
AMIT Q. GRESSEL  
ARIEL C. GREEN ANABA

Attorneys for Defendants,  
GOOGLE LLC, ALPHABET, INC.,  
AND YOUTUBE LLC

1 Dated: March 21, 2023

DAVIS WRIGHT TREMAINE LLP

2 /s/ Scott Commerson

3 SCOTT R. COMMERSON

4 Attorneys for Defendant  
5 AMAZON.COM, INC.

6  
7  
8 Dated: March 21, 2022

KAUFMAN LEGAL GROUP, APC

9  
10 By



11 STEPHEN J. KAUFMAN  
12 GARY WINUK

13 Attorneys for Defendant,  
14 DNC SERVICE CORPORATION

15  
16 Dated: March 21, 2022

LAW OFFICES OF MICHAEL E.  
17 REZNICK

18  
19 By

/s/ Michael E. Reznick

20 MICHAEL E. REZNICK

21 Attorneys for Plaintiffs RICHARD  
22 JACKSON, JULIE BRIGGS, and  
23 GREGG BUCHWALTER  
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**ATTESTATION**

Pursuant to Local Rule 5-4.3.4(a)(2), the file attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Paven Malhotra  
PAVEN MALHOTRA